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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC MICHAEL JAKLITSCH,

Defendant.

CASE NO. 2:22-CR-00015 WBS

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 13, 2022
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

1. By previous order, this matter was set for status on June 13, 2022.
2. By this stipulation, the defendant now move to continue the status conference until July 25, 2022, and to exclude time between June 13, 2022, and July 25, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes over 9,900 pages and items of law enforcement reports, EDD records, bank records, ID.me records, witness statements, photographs, jail call recordings, and search warrant items. The government is also in the process of producing new discovery that is now available to defense counsel for inspection, including Cellebrite extraction reports for certain electronic devices seized from the defendant. All this discovery has been either produced directly to counsel and/or is available to the defense for inspection and copying under the current Protective

1 Order.

2 b) Counsel for defendant desire additional time to consult with his client, to review
3 the current charges, to conduct investigation and research related to the charges, to review
4 discovery for this matter, to discuss potential resolutions with his client, and to otherwise prepare
5 for trial.

6 c) Counsel for defendant believes that failure to grant the above-requested
7 continuance would deny them the reasonable time necessary for effective preparation, taking into
8 account the exercise of due diligence.

9 d) The government does not object to the continuance.

10 e) Based on the above-stated findings, the ends of justice served by continuing the
11 case as requested outweigh the interest of the public and the defendant in a trial within the
12 original date prescribed by the Speedy Trial Act.

13 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
14 et seq., within which trial must commence, the time period of June 13, 2022 to July 25, 2022,
15 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
16 because it results from a continuance granted by the Court at defendant's request on the basis of
17 the Court's finding that the ends of justice served by taking such action outweigh the best interest
18 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: June 7, 2022

PHILLIP A. TALBERT
United States Attorney

/s/ ROBERT J. ARTUZ
ROBERT J. ARTUZ
Assistant United States Attorney

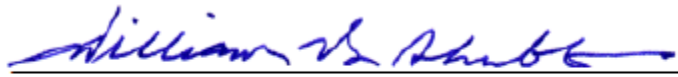
Dated: June 7, 2022

/s/ ALEX KESSEL
Alex Kessel
Counsel for Defendant
ERIC MICHAEL JAKLITSCH

ORDER

IT IS SO FOUND AND ORDERED.

Dated: June 8, 2022


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE